



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 03, 2016

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MS. NICOLE O'LOUGHLIN
PYXIS REGULATORY CONSULTING INC, AGENT FOR
AXSS TECHNICAL HOLDINGS, LLC
4110 136TH ST CT NW
GIG HARBOR, WA 98332

Dear Ms. O'Loughlin:

Subject: Transfer of Pesticide Registrations and Data From Company Number **83520**
to Company Number **87427**

Pursuant to your request in your letter and transfer agreement received July 05, 2016,
we have approved the transfer of the following registrations from **TACOMA AG, LLC**,
company number **83520** to **AXSS TECHNICAL HOLDINGS, LLC**, company number **87427**.

The effective date of these changes is the date of this letter.

<u>Registered Products</u>	<u>Old EPA Reg. No.</u>	<u>New EPA Reg. No.</u>
MEPIQUAT CHLORIDE TECHNICAL	83520-1	87427-2
BIFENTHRIN TECHNICAL	83520-5	87427-4
GLYPHOSATE 62% MANUFACTURING CONCENTRATE	83520-6	87427-5
DICAMBA ACID TECHNICAL	83520-8	87427-6
2,4-D ACID TECHNICAL	83520-9	87427-7
2,4-D AMINE MANUFACTURING CONCENTRATE	83520-15	87427-8
2,4-D ESTER MANUFACTURING CONCENTRATE	83520-16	87427-9
GLYPHOSATE ACID TECHNICAL	83520-17	87427-10

CLETHODIM 37% MUP	83520-23	87427-11
SODIUM ACIFLUORFEN 44% MUP	83520-25	87427-12
SODIUM BENTAZON 55.9% MUP	83520-27	87427-13
TEBUCONAZOLE TECHNICAL	83520-30	87427-14
THIOPHANATE-METHYL TECHNICAL	83520-31	87427-15
ETHEPHON MUP	83520-34	87427-16
	Old EPA	New EPA
<u>Pending Registered Products</u>	<u>File Symbol</u>	<u>File Symbol</u>
Tacoma Ag Imidacloprid Tech	83520-GA	87427-G
Tacoma Ag Fomesafen Tech	83520-GT	87427-RT
Tacoma Ag Diflubenazuron Tech	83520-GI	87427-RI
Tacoma Ag Imazethapyr Tech	83520-GO	87427-RO

You should indicate the new company designation, new EPA Registration Number and new Establishment Number (if it has changed) on the labeling at the next printing which should occur no later than 18 months after the effective date of this transfer. After 18 months, any product released for shipment must bear the new Registration Number and Establishment Number. If you intend to use the labels which currently appear on the transferor's product after the effective date of the transfer, but within the 18 month grace period, you must maintain complete and accurate records which identify by batch number, lot number, or other suitable description the quantities of such product bearing the transferor's label. Each container or package bearing the transferor's label which is released after the effective date of product registration transfer, must be clearly and accurately marked with the batch number, lot number or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental distributors of the transferred product(s) of this transfer agreement. If you wish to enter into supplemental distribution agreements of your product(s) under this new registration, the form "Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5, must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or

labeling may require EPA review and approval prior to distribution or sale of the product containing the new registration number. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

With regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The annual maintenance fee is based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

The Agency acknowledges it has received a request for data transfer received July 05, 2016 to transfer data ownership from the transferor to the transferee. The data transfer is effective the date of this letter. After this date **AXSS TECHNICAL HOLDINGS, LLC** will be considered the data owner. This action will not automatically reflect on the Data Submitters List. If you want to be added to the Data Submitters List, you must submit a request to:

Document Processing Desk (DSL)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval please contact Louis Vaughn at (703) 308-8114.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Robbins", is positioned above the typed name.

Steve Robbins, Chief
Information Services Branch
Information Technology & Resource Management Div. (7504P)

cc: MS. ANN TILLMAN
PYXIS REGULATORY CONSULTING, INC., AGENT FOR
TACOMA AG, LLC
4110 136TH ST, CT NW
GIG HARBOR, WA 98332

RE: L_83520_RAD_87427_10_03_2016

CHECKLIST FOR TRANSFER of REGISTRATION and DATA			
Transferor: Tacoma Ag, LLC		Co. #: 83520	
Transferee: AXSS Technical Holdings, LLC		Co. #: 87427	
Transfer Type: Registration and Data		Date: LTR: 07/01/2016 PP: 07/05/2016, 10/03/2016	
CHECK	REQUIREMENTS		
✓	Entry into Log Book	✓	Company info checked in OPPIN and printed
✓	Products verified in OPPIN (active/cancelled/suspended, etc.)	✓	Maintenance Fee Records checked (active/cancelled/SLN/fee paid)
Ensure That the Package Contains the Following:		COMMENTS	
✓	(1) XFER Agreement Has Original Signatures, Date Signed, Names and Titles of signatories from both parties?		
✓	(2) Name, Address & State of Incorporation of Transferor (& Co. #)	DE	
✓	(3) Name, Address & State of Incorporation of Transferee (& Co. #.)	DE	
✓	(4) List & EPA Registration No.(s) of the product(s) being transferred.	18 Products and 94 MRIDs (No Exclusive Use)	
✓	(5) Statement that the Transferor transfers to the Transferee all right, title, and interest in the EPA registration(s) and data listed in the document.		
✓	(6) Statement that the transferred registration(s) shall not serve as collateral or otherwise secure any loan or other payment arrangement or executory promise. The reg'n(s) shall not revert to the Transferor unless a new transfer agreem't is submitted to & approved by the Agency		
✓	(7) Description of the general nature of the underlying transaction, e.g., merger spin-off, bankruptcy (no financial info. need be disclosed)	"asset exchange"	
✓	(8) Statement that the Transferor and Transferee understand that any false statement may be punishable under law (18 USC1001)		
✓	(9) An acknowledgement by Transferee that its rights & duties concerning the reg'n under FIFRA and 40 CFR, Ch. 1 will be deemed by EPA to be the same as those of the Transferor at the time the transfer is approved.		
✓	DATA Data transfers must also include: (1) Name of the study; (2) Is study exclusive use (if so, when does exclusive use expire); (3) Name of person or lab that <u>conducted</u> the study; (4) Date study submitted to EPA; (5) MRID or other EPA administrative number.		
(10) Notarized Affirmation Statement from Transferor Affirming that:			
✓	(A) The person signing the transfer agreement is authorized by the registrant (and/or original data submitter) to bind the Transferor.		
✓	(B) No court order prohibits the transfer, & that any required court approvals have been obtained.		
✓	(C) The transfer is authorized under all relevant Federal, State & local laws, & all relevant corporate charters, bylaws, partnerships, or other agreements.		
Note: It is preferable that the Affirmation Statement be signed by someone <u>other</u> than the person signing the transfer agreement.			
✓	Look in OPPIN for Next Registration Number for Transferee	87427-2	
LV	OPPIN Work (Actual Transfer)		
LV	Generate Letter and Give to Branch Chief for Signature		
Copies of Letter Made and Distributed/Mailed			
LV	Copy mailed to Transferor	LV	Sent copies to RD, JFR,
LV	Copy mailed to Transferee	LV	Copy placed In Transfer File
LV	Updated Log Book	Completed: <i>Louis Vaughn</i> Date: 10/03/2016	
Comments: RAD XFER. -LWV			



4110 136TH ST CT NW
GIG HARBOR, WA 98332
T: (253) 853-7369
F: (253) 853-5516
NICOLE@PYXISRC.COM

July 1, 2016

COURIER DELIVERY

Steve Robbins, Branch Chief
Information Services Branch (XFER)
Information Technology & Resource Management Div. (7504P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Transfer of Product Registration and Data from Tacoma Ag, LLC (EPA Company No. 83520) to AXSS Technical Holdings, LLC (EPA Company No. 87427)

Dear Mr. Robbins,

Enclosed with this letter is a duly signed and notarized document pertaining to the transfer of the product registrations and all data rights from Tacoma Ag, LLC (EPA Company No. 83520) to AXSS Technical Holdings, LLC (EPA Company No. 87427) for the following products:

EPA Registration Number	Product Name
83520-1	Mepiquat Chloride Technical
83520-5	Bifenthrin Technical
83520-6	Glyphosate 62% Manufacturing Concentrate
83520-8	Dicamba Acid Technical
83520-9	2,4-D Acid Technical
83520-15	2,4-D Amine Manufacturing Concentrate
83520-16	2,4-D Ester Manufacturing Concentrate
83520-17	Glyphosate Acid Technical
83520-23	Clethodim 37% MUP
83520-25	Sodium Acifluorfen 44% MUP
83520-27	Sodium Bentazon 55.9% MUP
83520-30	Tebuconazole Technical
83520-31	Thiophanate-Methyl Technical
83520-34	Ethephon MUP
83520-GA	Tacoma Ag Imidacloprid Tech
83520-GT	Tacoma Ag Fomesafen Tech
83520-GI	Tacoma Ag Diflufenzuron Tech
83520-GO	Tacoma Ag Imazethapyr Tech

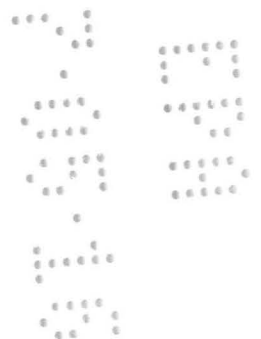
A list of the data to be transferred from Tacoma Ag is found in Appendix A of the transfer agreement. If you have any questions or need additional information, please contact me at Nicole@PyxisRC or 253-853-7369.

Best Regards,

A handwritten signature in black ink, appearing to read "Nicole O'Loughlin". The signature is fluid and cursive, with the first name "Nicole" and last name "O'Loughlin" clearly distinguishable.

Nicole O'Loughlin
Agent for Tacoma Ag, LLC

Enclosure


A large, faint, pixelated graphic of the number 7, composed of small dots, located in the bottom right corner of the page.

TRANSFER AGREEMENT

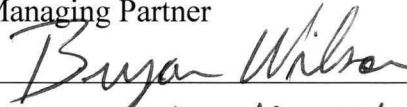
Notification is made this 24th day of May, 2016, by and between the TRANSFEROR Tacoma Ag, LLC and the TRANSFEREE AXSS Technical Holdings, LLC. In consideration of mutual covenants and agreements made and/or for good and valuable consideration, the parties agree as follows:

1. **PARTIES.** For the purpose of this Agreement, "Parties" shall mean:

a) **TRANSFEROR** (Current Registrant and/or data submitter):

EPA Company Number: 83520
Name: Tacoma Ag, LLC
Address: P.O. Box 14073
City: Durham State: NC Zip: 27709
State of Incorporation: Delaware
Name of Authorized Representative: Janelle Kay
Title of Authorized Representative: Agent
Original Signature of Authorized Representative: 
Date Signed: May 24, 2016

b) **TRANSFEREE** (Company Receiving Registrations and/or data):

EPA Company Number: 87427
Name: AXSS Technical Holdings, LLC
Address: 111 Martin Road
City: Fulton State: MS Zip: 38843
State of Incorporation: Delaware
Name of Authorized Representative: Bryan Wilson
Title of Authorized Representative: Managing Partner
Original Signature of Authorized Representative: 
Date Signed: May 19, 2016

2. **REGISTRATION.** For the purpose of this Agreement, "Registration" shall mean the following EPA registration number(s) and product name(s):

EPA Registration Number	Product Name
83520-1	Mepiquat Chloride Technical
83520-5	Bifenthrin Technical
83520-6	Glyphosate 62% Manufacturing Concentrate
83520-8	Dicamba Acid Technical
83520-9	2,4-D Acid Technical
83520-15	2,4-D Amine Manufacturing Concentrate
83520-16	2,4-D Ester Manufacturing Concentrate
83520-17	Glyphosate Acid Technical
83520-23	Clethodim 37% MUP
83520-25	Sodium Acifluorfen 44% MUP
83520-27	Sodium Bentazon 55.9% MUP
83520-30	Tebuconazole Technical
83520-31	Thiophanate-Methyl Technical
83520-34	Ethephon MUP
83520-GA	Tacoma Ag Imidacloprid Tech
83520-GT	Tacoma Ag Fomesafen Tech
83520-GI	Tacoma Ag Diflubenzuron Tech
83520-GO	Tacoma Ag Imazethapyr Tech

3. **REGISTRATION ASSIGNMENT.** Transferor does hereby irrevocably transfer to the Transferee all right, title and interest in the EPA registrations listed in this document.

4. **DATA ASSIGNMENT.** Transferor does hereby irrevocably transfer to the Transferee all right, title and interest in the items of data named herein. Data that are specifically part of this ASSIGNMENT are listed in APPENDIX A.

(SEE APPENDIX A)

5. **WARRANTY OF TITLE.** Transferor warrants that it is the lawful owner of the property hereby conveyed and that such property (registrations and/or data) shall not serve as collateral or otherwise secure any loan or other payment arrangement or executory promise, and that the registration(s) shall not revert to the transferor unless a new transfer agreement is submitted to and approved by the Agency.

6. **REASON FOR TRANSFER.** The transfer is a result of a business transaction/sale between the transferor and transferee.

EPA Registration Number	Product Name
83520-1	Mepiquat Chloride Technical
83520-5	Bifenthrin Technical
83520-6	Glyphosate 62% Manufacturing Concentrate
83520-8	Dicamba Acid Technical
83520-9	2,4-D Acid Technical
83520-15	2,4-D Amine Manufacturing Concentrate
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83520-GO	Tacoma Ag Imazethapyr Tech

3. **REGISTRATION ASSIGNMENT.** Transferor does hereby irrevocably transfer to the Transferee all right, title and interest in the EPA registrations listed in this document.

4. **DATA ASSIGNMENT.** Transferor does hereby irrevocably transfer to the Transferee all right, title and interest in the items of data named herein. Data that are specifically part of this ASSIGNMENT are listed in APPENDIX A.

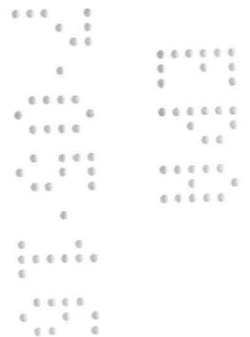
(SEE APPENDIX A)

5. **WARRANTY OF TITLE.** Transferor warrants that it is the lawful owner of the property hereby conveyed and that such property (registrations and/or data) shall not serve as collateral or otherwise secure any loan or other payment arrangement or executory promise, and that the registration(s) shall not revert to the transferor unless a new transfer agreement is submitted to and approved by the Agency.

6. **REASON FOR TRANSFER.** The transfer is a result of ^{an asset exchange (7/10/16, 10/4/16)} ~~a business transaction/sale~~ between the transferor and transferee.

7. **FALSE STATEMENTS.** The Transferor and Transferee understand that any false statement regarding these documents may be punishable under 18 U.S.C. 1001.

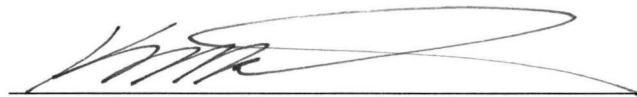
8. **TRANSFEEE ACKNOWLEDGEMENT.** Transferee acknowledges that his rights and duties concerning registration under FIFRA and 40 CFR, Chapter 1 will be deemed by EPA to be the same as those of the Transferor at the time the transfer is approved.



TRANSFEROR AFFIRMATION STATEMENT

The TRANSFEROR Tacoma Ag, LLC hereby affirms that:

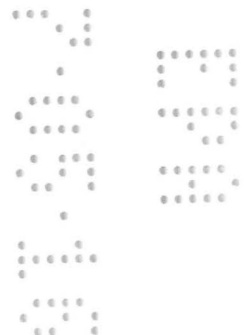
- (1) The person signing the transfer agreement is authorized by the registrant and/or original data submitter to bind the transferor;
- (2) No court order prohibits the transfer, and any required court approvals (if any) have been obtained; and
- (3) The transfer is authorized under all relevant Federal, State and local laws and all relevant corporate charters, bylaws, partnerships, or other agreements.



Kevin Howard
Managing Partner

Date: 05.19.2016

NOTARIAL CERTIFICATE



Transfer Affirmation Statement.

Acknowledgment of instrument signed by one person:

North Carolina

Wake County

I, Nicole Rower, a Notary Public for said County and State, do hereby certify that Kerim Howard personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and official seal, this the 19 day of May, 20 16.



Nicole Rower
Notary Public

My commission expires August 20, 20 18.

* If you ever had to write this out yourself – you would replace “foregoing instrument” with “attached _____” you would fill in the blank with whatever the document was – (ie: attached medical record)

page 26 in Notary Public Guidebook for North Carolina

APPENDIX A

MRID or other Identifying Administrative Number	Name of the Study	Name of Person or Lab that Conducted the Study	Date the Study was Submitted to EPA	Is Exclusive Use Claimed? (Y or N)	If Yes then, Date Period of Exclusive Use Ends
46869501	Product Identity and Composition of Mepiquat Chloride; Selected Studies: Description of Materials Used to Produce the Product; Description of Production Process; and Discussion of Formation of Impurities. Project Number: AU/MC/830. Unpublished study prepared by AXSS USA, LLC. 101 p.	Tacoma Ag, LLC	6/21/06	N	
46869502	Determination of the Physical and Chemical Characteristics and Preliminary Analysis of Technical Mepiquat Chloride. Project Number: 482S01, 482P01. Unpublished study prepared by EPL Bio-Analytical Services. 131 p.	EPL Bio-Analytical Services Tacoma Ag, LLC	6/21/06	N	
46937801	Product Identity and Composition of Bifenthrin TGAI; Description of Materials Used to Produce the Product; Description of Production Process; and Discussion of Formation of Impurities. Project Number: AU/BIF/830. Unpublished study prepared by Axss USA, LLC. 755 p.	Tacoma Ag, LLC	9/19/06	N	
46937802	Determination of the Physical and Chemical Characteristics and Preliminary Analysis of Technical Bifenthrin. Project Number: 482S02, 482P02. Unpublished study prepared by EPL Bio-Analytical Services. 196 p.	EPL Bio-Analytical Services Tacoma Ag, LLC	9/19/06	N	
47042001	Glyphosate 62% Manufacturing Concentrate: Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Formulation Process, Discussion of Formation of Impurities, Certified Limits, Enforcement Analytical Method, Submittal of Samples. Project Number: AXSS/GLY62/830. Unpublished study prepared by Biologic, Inc. 51 p.	Biologic Inc. Tacoma Ag, LLC	1/11/07	N	
47042002	Physical and Chemical Characteristics of IPA Glyphosate 62%: Final Report. Project Number: CHB/EX/296. Unpublished study prepared by Phibro-Tech Inc. 17 p.	Phibro-Tech, Inc. Tacoma Ag, LLC	1/11/07	N	
47075601	Product Identity and Composition of Dicamba Acid TGAI; Description of Materials Used to Produce the Product; Description of Process; and Discussion of Formation of Impurities. Project Number: AU/DCM/830. Unpublished study prepared by AXSS USA LLC. 237 p.	Tacoma Ag, LLC	3/9/07	N	
47075602	Determination of the Physical and Chemical Characteristics and Preliminary Analysis of Technical Dicamba. Project Number: 48G124-01/12855/01/001, 20060607. Unpublished study prepared by EPL Bio-Analytical Services. 185 p.	EPL Bio-Analytical Services Tacoma Ag, LLC	3/9/07	N	

MRID or other Identifying Administrative Number	Name of the Study	Name of Person or Lab that Conducted the Study	Date the Study was Submitted to EPA	Is Exclusive Use Claimed? (Y or N)	If Yes then, Date Period of Exclusive Use Ends
47112201	Product Identity and Composition of 2,4-Dichlorophenoxy Acetic Acid (2,4-D) TGAI: Selected Studies to Fullfill OPPTS Guidelines Series 830 in Accordance with 40 CFR Parts 158.155, 158.160, 158.162 and 158.167: Description of Materials Used to Produce the Product, Description of Production Process, and Discussioun of the Formation of Impurities. Project Number: AU/24D/830. Unpublished study prepared by Biologic Inc. 113 p.	Biologic Inc.	4/20/07	N	
47112202	Determination of the Physical and Chemical Characteristics and Preliminary Analysis of Technical 2,4-Dichlorophenoxy Acetic Acid (2,4-D). Project Number: 486G182, 486G182A. Unpublished study prepared by EPL Bio-Analytical Services. 294 p.	EPL Bio-Analytical Services	4/20/07	N	
47387201	Product Identity and Composition: 2,4-D Amine Manufacturing Concentrate. Project Number: AXSS/24DAMC/830. Unpublished study prepared by Biologic, Inc. 43 p.	Biologic Inc. Tacoma Ag, LLC	3/31/08	N	
47387202	Physical and Chemical Characteristics of 2,4-D DMA 6 LB/Gal: Final Report. Project Number: CHB/EX/472/005/P/1, CHB/EX/472/001/P/1. Unpublished study prepared by PhibroWood, LLC. 16 p.	Tacoma Ag, LLC PhibroWood, LLC	3/31/08	N	
47396401	Product Identity and Composition: 2,4-D Ester Manufacturing Concentrate. Project Number: AXSS/24DEMC/830. Unpublished study prepared by Biologic, Inc. 53 p.	Biologic Inc. Tacoma Ag, LLC	4/9/08	N	
47396402	Physical and Chemical Characteristics of 2,4-D Ester Manufacturing Concentrate: Final Report. Project Number: CHB/EX/485/004/P/1, CHB/EX/485/001/P/1. Unpublished study prepared by PhibroWood, LLC. 18 p.	Tacoma Ag, LLC PhibroWood, LLC	4/9/08	N	
47411801	Product Identity and Composition of Glyphosate Acid TGAI; Selected Studies of Fulfill OPPTS Guidelines Series 830: Description of Materials Used to Produce the Product Using Glycine as the Starting Raw Material: Description of the Production Process, and Discussion of the Formation of Impurities. Project Number: AU/GLY/830. Unpublished study. 105 p.	Biologic Inc.	4/25/08	N	
474118002	Product Identity and Composition of Glyphosate Acid TGCI; Selected Studies of Fulfill OPPTS Guidelines Series 830: Description of Materials Used to Produce the Product Using Iminodiacetic Acid as the Starting Raw Material: Description of Production Process, and Dissecussion of Formation of Impurities. Project Number: AU/GLY/830. Unpublished study. 121 p.	Biologic Inc.	4/25/08	N	

MRID or other Identifying Administrative Number	Name of the Study	Name of Person or Lab that Conducted the Study	Date the Study was Submitted to EPA	Is Exclusive Use Claimed? (Y or N)	If Yes then, Date Period of Exclusive Use Ends
47411803	Determination of the Physical and Chemical Characteristics and Preliminary Analysis of Technical Glyphosate. Project Number: 486G412. Unpublished study prepared by EPL Bio-Analytical Services. 247 p.	Tacoma Ag, LLC EPL Bio-Analytical Services	4/25/08	N	
47457401	Product Identity and Composition of Mepiquat Chloride; Selected Studies to Fulfill OPPTS Guideline Series 830 in Accordance with 40 CFR Parts 158.155, 158.160, 158.162, and 158.167; Description of Materials Used to Produce the Product; Description of Production Process; and Discussion of Formation of Impurities. Project Number: AU/MC/830/REV. Unpublished study prepared by Axss USA, LLC. 123 p.	Tacoma Ag, LLC	6/25/08	N	
47509201	Storage Stability and Corrosion Characteristics of IPA Glyphosate 62%: Final Report. Project Number: CHB/EX/297/018/P/1, CHB/EX/297. Unpublished study prepared by PhibroWood, LLC. 34 p.	Tacoma Ag, LLC PhibroWood, LLC	8/14/08	N	
47823801	Storage Stability and Corrosion Characteristics of Axss 2,4-D DMA 6 Lb/Gal: Final Report. Project Number: CHB/EX/507/013/P/1, CHB/EX/507, CHB/OP/MTH/095/P/18. Unpublished study prepared by PhibroWood, LLC. 25 p.	Tacoma Ag, LLC PhibroWood, LLC	8/7/09	N	
47823901	Storage Stability and Corrosion Characteristics of Axss 2,4-D Ester Manufacturing Use Product: Final Report. Project Number: CHB/EX/506/014/P/1, CHB/EX/506, CHB/OP/MTH/107/P/7. Unpublished study prepared by PhibroWood, LLC. 23 p.	Tacoma Ag, LLC PhibroWood, LLC	8/7/09	N	
47968401	Storage Stability and Corrosion Characteristics of Axss 2,4-D Technical: Final Report. Project Number: CHB/EX/555/013/P/1, CHB/EX/555, ARC/OP/MTH/095/P/19. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 41 p.	Tacoma Ag, LLC Analytical & Regulatory Chemistry, Inc.	2/2/10	N	
47970801	Storage Stability and Corrosion Characteristics of Axss Dicamba Technical: Final Report. Project Number: CHB/EX/558/013/P/1, CHB/EX/558, ARC/OP/MTH/095/P/19. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 42 p.	Tacoma Ag, LLC Analytical & Regulatory Chemistry, Inc.	2/2/10	N	
48019101	Storage Stability and Corrosion Characteristics of Axss USA Glyphosate Tech: Final Report. Project Number: ARC/EX/575, CHB/EX/575/014/P/1, ARC/OP/MTH/096/P/16. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 39 p.	Analytical & Regulatory Chemistry, Inc. AXSS Technical Holdings, LLC	3/11/10	N	
48216101	Oxidation/Reduction Analysis of Dicamba TGAI: Final Report. Project Number: NC/2010/030. Unpublished study prepared by Nutrichem Laboratory Co., Ltd. 20 p.	Nutrichem Laboratory Co. Ltd. Tacoma Ag, LLC	9/7/10	N	

MRID or other Identifying Administrative Number	Name of the Study	Name of Person or Lab that Conducted the Study	Date the Study was Submitted to EPA	Is Exclusive Use Claimed? (Y or N)	If Yes then, Date Period of Exclusive Use Ends
48227201	Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Description of the Formulation Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for Clethodim 37% MUP. Project Number: AX/201002. Unpublished study prepared by Pyxis Regulatory Consulting, Inc. 203 p.	Tacoma Ag, LLC Jiangsu Fengshan Group Co., Ltd.	9/15/10	N	
48227202	Preliminary Analysis: AX106C TGAI. Project Number: P809, 29274. Unpublished study prepared by Eurofins/Product Safety Laboratories. 140 p.	Tacoma Ag, LLC Eurofins/Product Safety Laboratories	9/15/10	N	
48227203	Physical and Chemical Characteristics: Color, Physical State, Odor, Ph, and Density/Relative Density: AX106C TGAI. Project Number: P801, 29275. Unpublished study prepared by Eurofins/Product Safety Laboratories. 13 p.	Tacoma Ag, LLC Eurofins/Product Safety Laboratories	9/15/10	N	
48227204	Physical and Chemical Characteristics: Color, Physical State, Odor, Oxidation/Reduction, Flammability, pH, Viscosity, and Density/Relative Density. Project Number: P801, 29273. Unpublished study prepared by Eurofins/Product Safety Laboratories. 16 p.	Tacoma Ag, LLC Eurofins/Product Safety Laboratories	9/15/10	N	
48227205	Physical and Chemical Characteristics: Stability to Normal and Elevated Temperature: AX106C MUP. Project Number: P804/TGAI, 29272. Unpublished study prepared by Eurofins/Product Safety Laboratories. 19 p.	Tacoma Ag, LLC Eurofins/Product Safety Laboratories	9/15/10	N	
48227206	AX106C MUP: Physical and Chemical Characteristics and Waiver Requests. Project Number: AX/201003. Unpublished study prepared by Pyxis Regulatory Consulting, Inc. 11 p.	Tacoma Ag, LLC Jiangsu Fengshan Group Co., Ltd.	9/15/10	N	
48449001	Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, and Certified Limits for 2,4-D Acid Technical. Project Number: TA/201101. Unpublished study prepared by Pyxis Regulatory Consulting, Inc. 81 p.	Tacoma Ag, LLC Jiangsu Fengshan Group Co., Ltd.	4/12/11	N	
48449002	Preliminary Analyses of Five Representative Production Batches of 2,4 Dichloro Phenoxy Acetic Acid Technical Grade Active Ingredient (TGAI) to Determine Percent 2,4 Dichloro Phenoxy Acetic Acid and to Quantify its Associated Impurities. Project Number: JRF/8878. Unpublished study prepared by Jai Research Foundation. 256 p.	Meghmani Organics Limited Jai Research Foundation	4/12/11	N	
48449003	Preliminary Analyses of Five Representative Production Batches of 2,4 Dichloro Phenoxy Acetic Acid Technical Grade Active Ingredient (TGAI) to Quantify its Associated Impurities. Project Number: MEGHMANI/0610. Unpublished study prepared by UIS Umweltinstitut Synlab GmbH. 485 p.	Meghmani Organics Limited UIS Umweltinstitut Synlab GmbH	4/12/11	N	



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48472301	Five Batch Study of 2,4-D Technical. Project Number: BA/04/09, 363700023. Unpublished study prepared by Rokita Agro A.A./Makhteshim Agan Agro Poland S.A. 216 p.	Rokita Agro A.A. Makhteshim Agan Agro Poland S.A.	5/5/11	N	
48490701	Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, and Certified Limits for Bifenthrin Technical. Project Number: TA/201102. Unpublished study prepared by Tacoma Ag, LLC. 207 p.	Tacoma Ag, LLC	5/25/11	N	
48490702	Preliminary Analysis and Enforcement Analytical Method of Bifenthrin TGAI - Validation of Analytical Methodology for the Assay of Active Ingredient and Related Significant Impurities and Subsequent 5-Batch Analysis of Bifenthrin TGAI: Final Report. Project Number: NC/2011/013. Unpublished study prepared by Nutrichem Laboratory Co., Ltd. 218 p.	Yancheng South Chemicals Co., Ltd. Nutrichem Laboratory Co. Ltd.	5/25/11	N	
48497401	Storage Stability and Corrosion Characteristics of Axss USA Bifenthrin Technical: Final Report. Project Number: ARC/EX/574/013/P/1, ARC/EX/574. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 42 p.	Analytical & Regulatory Chemistry, Inc. AXSS Technical Holdings, LLC	6/2/11	N	
48621401	AX106C MUP: Storage Stability and Corrosion Characteristics. Project Number: 29271, P800. Unpublished study prepared by Eurofins/Product Safety Laboratories. 27p.	Tacoma Ag, LLC Eurofins/Product Safety Laboratories	10/13/11	N	
48735501	Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for Tacoma Ag Sodium Acifluorfen 44% MUP. Project Number: TA/201104. Unpublished study prepared by Tacoma Ag, LLC. 138p.	Tacoma Ag, LLC	2/2/12	N	
48735502	Preliminary Analysis of Acifluorfen TGAI: Final Report. Project Number: NC/2011/070. Unpublished study prepared by Nutrichem Laboratory Co., Ltd. 183p.	Shangyu Nutrichem Co., Ltd. Nutrichem Laboratory Co. Ltd.	2/2/12	N	
48735503	Chemical and Physical Characterization of Acifluorfen-Sodium 44% MUP: Color, Physical State, Odor, Stability, pH, Viscosity, Density and Oxidation/Reduction: Final Report. Project Number: NC/2011/072. Unpublished study prepared by Nutrichem Laboratory Co., Ltd. 55p.	Shangyu Nutrichem Co., Ltd. Nutrichem Laboratory Co. Ltd.	2/2/12	N	
48735504	Chemical and Physical Characterization of Acifluorfen TGAI: Color, Physical State, Odor, Stability, pH, UV-Vis, Melting Point and Density: Final Report. Project Number: NC/2011/071. Unpublished study prepared by Nutrichem Laboratory Co., Ltd. 56p.	Shangyu Nutrichem Co., Ltd. Nutrichem Laboratory Co. Ltd.	2/2/12	N	

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48735505	Tacoma Ag Sodium Acifluorfen 44% MUP Waiver Request for Physical and Chemical Properties. Project Number: TA/201105. Unpublished study prepared by Tacoma Ag, LLC. 9p	Tacoma Ag, LLC	2/2/12	N	
48882601	Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for Sodium Bentazon 55.9% MUP. Project Number: TA/201203. Unpublished study prepared by Tacoma Ag, LLC. 106p.	Tacoma Ag, LLC	7/11/12	N	
48882602	Preliminary Analysis and Enforcement Analytical Method of Bentazone TGAI - Validation of Analytical Methodology for the Assay of Active Ingredient and Related Significant Impurities and Subsequent 5-Batch Analysis of Bentazone TGAI: Final Report. Project Number: NC/2011/035. Unpublished study prepared by Nutrichem Laboratory Co., Ltd. 176p.	Nutrichem International Co. Ltd. Nutrichem Laboratory Co., Ltd.	7/11/12	N	
48882603	Chemical and Physical Characterization of Bentazone Sodium 55.9% MUP: Color, Physical State, Odor, Oxidation/Reduction, pH, Explodability, Density, Flash Point, Accelerated Storage Stability and Viscosity: Final Report. Project Number: NC/2012/009. Unpublished study prepared by Nutrichem Laboratory Co., Ltd. 45p.	Nutrichem International Co. Ltd. Nutrichem Laboratory Co., Ltd.	7/11/12	N	
48882604	Chemical and Physical Characterization of Bentazone TGAI: Color, Physical State, Odor, Stability, Oxidation/Reduction, pH, UV-Vis, Melting Point, Density, Dissociation Constant, Partition Coefficient and Solubility: Final Report. Project Number: NC/2011/036. Unpublished study prepared by Nutrichem Laboratory Co., Ltd. 91p.	Nutrichem International Co. Ltd. Nutrichem Laboratory Co., Ltd.	7/11/12	N	
48882605	Sodium Bentazon 55.9% MUP Waiver Request for Physical and Chemical Properties. Project Number: TA/201204. Unpublished study prepared by Tacoma Ag, LLC. 7p.	Tacoma Ag, LLC	7/11/12	N	
49155201	Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Description of the Formulation Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for Clethodim 37% MUP. Project Number: TA/201301. Unpublished study prepared by Tacoma Ag, LLC. 233p.	Tacoma Ag, LLC	6/17/13	N	
49155202	Preliminary Analysis and Enforcement Analytical Method of Clethodim TGAI. Project Number: NC/2011/088. Unpublished study prepared by Nutrichem Laboratory Co., Ltd. 380p.	Yancheng South Chemicals Company, Ltd. Nutrichem Laboratory Co. Ltd.	6/17/13	N	



MRID or other Identifying Administrative Number	Name of the Study	Name of Person or Lab that Conducted the Study	Date the Study was Submitted to EPA	Is Exclusive Use Claimed? (Y or N)	If Yes then, Date Period of Exclusive Use Ends
49155203	5-Batch Analysis of Active Ingredients for Clethodim 37% MUP. Project Number: NC/2012/073. Unpublished study prepared by Nutrichem Laboratory Co., Ltd. 48p.	Yancheng South Chemicals Company, Ltd. Nutrichem Laboratory Co. Ltd.	6/17/13	N	
49155204	Validation of Analytical Methodology for the Assay of Active Ingredient in Clethodim TGAI. Project Number: NC/2011/089. Unpublished study prepared by Nutrichem Laboratory Co., Ltd. 41 p.	Nutrichem Laboratory Co. Ltd.	6/17/13	N	
49400301	Determination of Accelerated Storage Stability and Corrosion Characteristics of Acifluorfen-Sodium 44% MUP: Final Report. Project Number: NC/2014/026, NC2014026A, NC/GLP/SOP/728. Unpublished study prepared by Nutrichem Laboratory Co., Ltd. 50p.	Shangyu Nutrichem Co., Ltd. Nutrichem Laboratory Co., Ltd.	6/6/14	N	
49426801	Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for Glyphosate Acid Technical. Project Number: TA/201401. Unpublished study prepared by TACOMA AG, LLC. 75p.	Tacoma Ag, LLC	7/11/14	N	
49426802	Preliminary Analysis of Five Representative Production Batches of Glyphosate Technical Grade Active Ingredient (TGAI) to Determine Percent Glyphosate and to Quantify Its Associated Impurities. Project Number: WW/025. Unpublished study prepared by AgriFor Scientific Pty, Ltd. 292p.	AgriFor Scientific PTY Ltd.	7/11/14	N	
49729501	Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for Glyphosate Acid Technical. Project Number: TA/201501. Unpublished study prepared by Tacoma Ag, LLC. 77p.	Tacoma Ag, LLC	10/6/15	N	
49729502	Glyphosate Technical: Preliminary Analysis of a Test Substance (5 Batch Analysis): Final Report. Project Number: 11992/08. Unpublished study prepared by Stillmeadow, Inc. 87p.	Stillmeadow, Inc.	10/6/15	N	
49773601	Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for Sodium Bentazon 55.9% MUP. Project Number: TA/201504. Unpublished study prepared by Tacoma AG, LLC. 36p.	Tacoma Ag, LLC	12/2/15	N	

MRID or other Identifying Administrative Number	Name of the Study	Name of Person or Lab that Conducted the Study	Date the Study was Submitted to EPA	Is Exclusive Use Claimed? (Y or N)	If Yes then, Date Period of Exclusive Use Ends
49773602	Five-Batch Analysis of Bentazone TGAI - Validation of Analytical Methodology for the Assay of Active Ingredient and Impurity in Bentazone TGAI and Subsequent 5-Batch Analysis of the Test Item. Project Number: ABC/2015/18, ABCTM/2015/18/02, ABCTM/2015/18/04. Unpublished study prepared by Achiever Biochem Co., Ltd. 214p.	Achiever Biochem Co., Ltd.	12/2/15	N	
49773603	Five-Batch Analysis of Bentazone TGAI Final Report Amendment. Project Number: ABC/2015/18/AMENDMENT/NO//01. Unpublished study prepared by Achiever Biochem Co., Ltd. 4p.	Achiever Biochem Co., Ltd.	12/2/15	N	
49778601	Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for Tacoma Ag Imidacloprid Tech. Project Number: TA/201502. Unpublished study prepared by Tacoma Ag, LLC. 112p.	Tacoma Ag, LLC	12/9/15	N	
49778602	Five-Batch Analysis of Imidacloprid TGAI – Validation of Analytical Methodology for the Assay of Active Ingredient and Impurities in Imidacloprid TGAI and Subsequent 5-Batch Analysis of the Test Item: Final Report. Project Number: ABC/2015/13. Unpublished study prepared by Achiever Biochem Company Limited GLP Lab. 242p.	Achiever Biochem Co., Ltd.	12/9/15	N	
49778603	Five-Batch Analysis of Imidacloprid TGAI – Validation of Analytical Methodology for the Assay of Impurity III in Imidacloprid TGAI and Subsequent 5-Batch Analysis of the Test Item. Project Number: ABC/2015/15. Unpublished study prepared by Achiever Biochem Company Limited GLP Lab. 102p.	Achiever Biochem Co., Ltd.	12/9/15	N	
49778604	Physical and Chemical Characterization of Imidacloprid TGAI - Color, Physical State, Odor, Stability, Oxidation/Reduction, pH, UV/visible absorption, Melting Point, Density, Dissociation Constant, Partition Coefficient and Solubility: Final Report. Project Number: ABC/2015/14, ABC/2015/13. Unpublished study prepared by Achiever Biochem Company Limited GLP Lab. 115p.	Achiever Biochem Co., Ltd.	12/9/15	N	
49778605	Tacoma Ag Imidacloprid Tech Physical and Chemical Properties and Waiver Requests. Project Number: TA/201503. Unpublished study prepared by Tacoma Ag, LLC. 6p.	Tacoma Ag, LLC	12/9/15	N	
49793801	Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for Tacoma Ag Fomesafen Tech. Project Number: TA/201505. Unpublished study prepared by Tacoma Ag, LLC. 125p.	Tacoma Ag, LLC	1/28/16	N	



MRID or other Identifying Administrative Number	Name of the Study	Name of Person or Lab that Conducted the Study	Date the Study was Submitted to EPA	Is Exclusive Use Claimed? (Y or N)	If Yes then, Date Period of Exclusive Use Ends
49793802	Qualitative and Quantitative Profile of the Test Substance Fomesafen (Five Batch Analysis). Project Number: 010750/030/020/13. Unpublished study prepared by BIOAGRI Laboratorios, Ltda. 218p.	BIOAGRI Laboratorios, Ltda.	1/28/16	N	
49793803	Fomesafen 98% Tech: Product Chemistry. Project Number: 19015/15. Unpublished study prepared by Stillmeadow, Inc. 23p.	Stillmeadow, Inc.	1/28/16	N	
49793804	Physical and Chemical Characterization of Fomesafen 98% Tech - Oxidation/Reduction and UV/Visible Absorption: Final Report. Project Number: ABC/2015/50. Unpublished study prepared by Achiever Biochem Company Limited GLP Lab. 36p.	Achiever Biochem Co., Ltd.	1/28/16	N	
49793805	Fomesafen 98% Tech: Accelerated Storage Stability with Corrosion Characteristics. Project Number: 19016/15. Unpublished study prepared by Stillmeadow, Inc. 27p.	Stillmeadow, Inc.	1/28/16	N	
49793806	Tacoma Ag Fomesafen Tech Physical and Chemical Properties and Waiver Requests. Project Number: TA/201506. Unpublished study prepared by Tacoma Ag, LLC. 15p.	Tacoma Ag, LLC	1/28/16	N	
49794501	Polychlorinated Dibenzodioxins and Polychlorinated Bibenzofurans Analysis of Dicamba TGA Final Report. Project Number: 01/19900/01/001, GLP/SP/216. Unpublished study prepared by Southwest Research Institute. 60p.	Southwest Research Institute	12/16/15	N	
49794502	Purity Profile of 5 Batches of Dicamba Technical Final Report. Project Number: B4018, GLP/SP/216. Unpublished study prepared by Southwest Research Institute. 194p.	Southwest Research Institute	12/16/15	N	
49817101	Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for Tacoma Ag Diflubenzuron Tech. Project Number: TA/201601. Unpublished study prepared by Tacoma Ag, LLC. 101p.	Tacoma Ag, LLC	2/4/16	N	
49817102	Qualitative and Quantitative Profile of the Test Substance Diflubenzuron Tecnico ST (Five Batch Analysis): Final Report. Project Number: 0690/030/494/09. Unpublished study prepared by BIOAGRI Laboratorios, Ltda. 220p.	BIOAGRI Laboratorios, Ltda.	2/4/16	N	
49817103	Determination of 4-Chloroaniline in Samples of Diflubenzuron Technical ST: Final Report. Project Number: 0690/043/008/10. Unpublished study prepared by BIOAGRI Laboratorios, Ltda. 70p.	BIOAGRI Laboratorios, Ltda.	2/4/16	N	

MRID or other Identifying Administrative Number	Name of the Study	Name of Person or Lab that Conducted the Study	Date the Study was Submitted to EPA	Is Exclusive Use Claimed? (Y or N)	If Yes then, Date Period of Exclusive Use Ends
49817104	Aspect: Physical State, Color and Odor of Diflubenzuron Technical. Project Number: Q1/88782. Unpublished study prepared by Microquim S.A. 14p.	Microquim S.A.	2/4/16	N	
49817105	Flash Point of Diflubenzuron Technical. Project Number: Q1/88785. Unpublished study prepared by Microquim S.A. 15p.	Microquim S.A.	2/4/16	N	
49817106	pH Determination of Diflubenzuron Technical. Project Number: Q1/88784. Unpublished study prepared by Microquim S.A. 16p.	Microquim S.A.	2/4/16	N	
49817107	Melting Point and Range of Diflubenzuron Tecnico ST. Project Number: 0690/005/360/10. Unpublished study prepared by BIOAGRI Laboratorios, Ltda. 14p.	BIOAGRI Laboratorios, Ltda.	2/4/16	N	
49817108	Melting Point and Range of Diflubenzuron Tecnico ST: Final Report. Project Number: 0690/005/360/10. Unpublished study prepared by BIOAGRI Laboratorios, Ltda. 9p.	BIOAGRI Laboratorios, Ltda.	2/4/16	N	
49817109	Physical and Chemical Characterization of Diflubenzuron Technical: Stability, Corrosive Characteristic, Oxidation/Reduction, UV/Vis Absorption and Density: Final Report. Project Number: ABC/2015/51. Unpublished study prepared by Achiever Biochem Company Limited GLP Lab. 60p.	Achiever Biochem Co., Ltd.	2/4/16	N	
49817110	Tacoma Ag Diflubenzuron Tech Physical and Chemical Properties and Waiver Requests. Project Number: TA/201602. Unpublished study prepared by Tacoma Ag, LLC. 7p.	Tacoma Ag, LLC	2/4/16	N	
49817111	Acute Oral Toxicity in Rats (Rattus norvegicus) with the Test Substance Diflubenzuron Tecnico ST: Final Report. Project Number: 0690/463/074/10. Unpublished study prepared by BIOAGRI Laboratorios, Ltda. 33p.	BIOAGRI Laboratorios, Ltda.	2/4/16	N	
49817112	Acute Dermal Toxicity in Rats (Rattus norvegicus) with the Test Substance Diflubenzuron Tecnico ST: Final Report. Project Number: 0690/464/073/10. Unpublished study prepared by BIOAGRI Laboratorios, Ltda. 27p.	BIOAGRI Laboratorios, Ltda.	2/4/16	N	
49817113	Acute Inhalation Toxicity Test with Diflubenzuron Tecnico ST in Rats (Rattus norvegicus): Final Report. Project Number: 0690/309/784/10. Unpublished study prepared by BIOAGRI Laboratorios, Ltda. 30p.	BIOAGRI Laboratorios, Ltda.	2/4/16	N	

MRID or other Identifying Administrative Number	Name of the Study	Name of Person or Lab that Conducted the Study	Date the Study was Submitted to EPA	Is Exclusive Use Claimed? (Y or N)	If Yes then, Date Period of Exclusive Use Ends
49817114	Acute Eye Irritation/Corrosion in Rabbits (<i>Oryctolagus cuniculus</i>) with the Test Substance Diflubenzuron Tecnico ST: Final Report. Project Number: 0690/465/098/10. Unpublished study prepared by BIOAGRI Laboratorios, Ltda. 27p.	BIOAGRI Laboratorios, Ltda.	2/4/16	N	
49817115	Acute Dermal Irritation/Corrosion in Rabbits (<i>Oryctolagus cuniculus</i>) with the Test Substance Diflubenzuron Tecnico St: Final Report. Project Number: 0690/466/075/10. Unpublished study prepared by BIOAGRI Laboratorios, Ltda. 27p.	BIOAGRI Laboratorios, Ltda.	2/4/16	N	
49817116	Skin Sensitisation in Guinea Pigs (<i>Cavia porcellus</i>) with the Test Substance Diflubenzuron Tecnico ST (Buehler Test Method): Final Report. Project Number: 0690/467/085/10. Unpublished study prepared by BIOAGRI Laboratorios, Ltda. 27p.	BIOAGRI Laboratorios, Ltda.	2/4/16	N	
49841501	Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for Tacoma Ag Imazethapyr Tech.	Tacoma Ag, LLC	3/7/16	N	
49841502	Five-Batch Analysis of Imazethapyr TGAI – Validation of Analytical Methodology for the Assay of Active Ingredient and Impurities in Imazethapyr TGAI and Subsequent 5-Batch Analysis of the Test Item.	Achiever Biochem Co., Ltd.	3/7/16	N	
49841503	Physical and Chemical Characterization of Imazethapyr TGAI– Color, Physical State, Odor, Stability, Corrosive Characteristic, Oxidation/Reduction, pH, UV/Vis Absorption, Density, Dissociation Constant, Melting Point, Partition Coefficient and Solubility.	Achiever Biochem Co., Ltd.	3/7/16	N	
49841504	Tacoma Ag Imazethapyr Tech Physical and Chemical Properties and Waiver Requests.	Tacoma Ag, LLC	3/7/16	N	

2016

2016



P.O. Box 14073
Durham, NC 27709
970.590.1949

09.06.2010

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agents for Tacoma Ag, LLC (EPA Company Number 83520), before the U.S. Environmental Protection Agency and state governmental agencies all matters regarding our pesticide registrations pursuant to the Federal insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. 5 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Howard", is written over a large, horizontal, oval-shaped line that serves as a decorative flourish or underline.

Kevin M. Howard
Managing Partner

cc: Pyxis Regulatory Consulting, Inc.

